REMARKS

Claims 1-21 are pending in this application. By this Amendment, claim 21 is amended. Reconsideration based on the above amendments and following remarks is respectfully requested.

The courtesies extended to Applicants' representative by Examiner Smith at the interview held January 27, 2005, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

Entry of the amendments is proper under 37 CFR §1.116 since the amendments: (a) place the application in condition for allowance (for the reasons discussed herein); (b) do not raise any new issue requiring further search and/or consideration (since the amendments amplify issues previously discussed throughout prosecution); (c) satisfy a requirement of form asserted in the previous Office Action; (d) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (e) place the application in better form for appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented because [e.g. they are made in response to arguments raised in the final rejection]. Entry of the amendments is thus respectfully requested.

I.   Claim 21 Satisfy 35 U.S.C. §101

The Office Action rejects claim 21 under 35 U.S.C. §101 alleging that the claimed invention is directed to non-statutory subject matter. Specifically, the Office Action alleges that claim 21, which is directed towards a "carry wave" is non-statutory. By this Amendment, claim 21 is amended to recite "a program stored on a computer readable medium." Thus, claim 21 meets the statutory requirements of 35 U.S.C. §101. Withdrawal of this rejection is respectfully requested.

II.   The Claims Define Patentable Subject Matter

The Office Action rejects claims 1-21 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,421,733 to Tso et al. in view of U.S. Patent No. 6,073,147 to Chan et al. This rejection is respectfully traversed.

None of the applied references teach or suggest a "language storage table for storing at least one translation of each of at least one skeleton content elements based on the skeleton content and a language ... wherein the at least one skeleton content elements include graphical content elements and textual content elements," as recited in claim 1, and similarly recited in independent claims 6, 11, 16 and 21. See, e.g., paragraphs [0013] and [0058].

That is, the system of the independent claims manages dynamic translation by transmitting the translation of the skeleton content elements in the language indicated by the client. If the user browser does not support the client's language character set, i.e., the textual content element, then the system transmits the translation of the skeleton content element as graphical content element. See, e.g., paragraphs [0013] and [0058]. The at least one translation of the skeleton elements, which include graphical content elements and textual content elements, are stored in a language table storage. See, e.g., Fig. 9.

Tso only discloses a system for dynamically transcoding data transmitted between two computers which can be used for dynamic translation. See, e.g., Tso, page 8, lines 41-45 and claim 4. As acknowledged by the Office Action on page 6, Tso does not teach skeleton content elements that include graphical content elements and textual content elements.

However, the Office Action asserts that Chan makes up for this deficiency. The Office Action Asserts that Chan discloses a server that maintains both graphical content and textual content elements in col. 3, lines 36-54. Specifically, the Office Action asserts that the font server maintains both a bit-mapped and an outlined version of each character, which respectively are graphic and text content elements. This assertion is respectfully traversed.

Chan does not disclose bit-map and outline versions of each character as asserted by the Office Action. Chan only discloses a system that includes a font resource server, that contains font information, i.e., characters of a font in multiple formats, such as a bit-mapped format and an outline format, so that different types of font information can be selectively employed at any given site. See, e.g., Chan, col. 2, lines 5-13. That is, the font server stores information related to a description of each font character in a format. See, e.g., Chan, col.3, lines 32-34. The description of characters are stored in a format, such as bitmap or outline, cited by Chan as two commonly employed formats. See, e.g., Chan, col. 3, lines 37-40.

Thus, the bit-map and outline formats are not versions of each character, but these formats are only information related to a character.

Further, the bit-map and outline formats of Chan do not correspond to graphic and text content elements as asserted by the Office Action. First, the font server of Chan selectively employs a bit-map format or an outline format for information to define a character. See, e.g., Chan, abstract. The bit-map and outline formats only differ in how each format defines a character, i.e., the same element. See, e.g., Chan, col. 3, lines 37-41. Nowhere does Chan disclose using both formats, let alone to represent different data elements.

Second, because the bit-mapped and outline formats of Chan are only information related to a font, neither of the formats provide a graphical content element as recited in the independent claims. Graphic content elements as recited in the independent claims are not only information, but are graphic files. Graphic content elements are generated for content elements associated with pictographic languages such as Japanese, Chinese, and/or Korean. See, e.g., paragraph [0013] and Fig. 9. These graphic content elements can be incorporated into Internet graphic format "png" files or any other supported graphic file format. See, e.g., paragraph [0013] and Fig. 9.

Thus, Chan does not disclose the graphical content elements as recited in the independent claims.

Finally, there is <u>no motivation</u> to combine the font server of Chan with the Tso, at least not as asserted by the Office Action. If the proposed modification or combination would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon,* 733 F. 2d 900, 221 USPQ 1125 (Fed. Cir. 1984); See also MPEP §2143.01. The advantage of the font server of Chan is to <u>reduce transmission time and memory requirements</u>. See, e.g., Chan, Abstract. The font server of Chan transmits a request to the font server for the necessary resources if a program or computer does not have the resources necessary to generate that font. See, e.g., Chan, col. 4, lines 10-29. The server retrieves the data that pertains to the specific character identified and returns it to the computer. See, e.g., col. 4, lines 45-52. Thus, the server of Chan reduces transmission time and memory requirements as a result of smaller document files, since the server of Chan allows user to display and print documents containing any of a large variety of fonts, without requiring font resource data to be included in a file with the document.

However, the system for managing dynamic translation recited in the independent claims merges the translation from a <u>language storage table</u> that stores at least one translation of each of the skeleton elements, which include graphical content elements and textual content elements. See, e.g., Fig. 9. The language storage table requires memory. Because the intended purpose of the font server of Chan is to reduce memory requirements, there is no motivation to combine Tso and Chan to achieve the features recited in the independent claims. In fact, Chan teaches away from such a combination or modification.

Thus, independent claims 1, 6, 11, 16 and 21 and the claims dependent therefrom, are not rendered obvious by Tso in view of Chan. Accordingly, withdrawal and reconsideration of this rejection is respectfully requested.

III.   Conclusion

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

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